

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**B.P., H.A., and S.H. individually, and
On behalf of all others similarly situated,**

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

_____ /

DECLARATION OF ELIZABETH A. KRAMER

I, Elizabeth A. Kramer, declare under penalty of perjury that the foregoing is true and correct:

1. Attached as **Exhibit A** are true and correct copies of conferral communications between Defendant Peters' counsel, Daniel H. Rader IV, and Plaintiffs' counsel.

2. During the meet and confer process on these subpoenas, Plaintiffs (1) expressly objected to Subpoena Requests 1-5 and 19; (2) agreed, for the remaining Requests, to search for and produce certain categories of documents or advise if no responsive documents were located; and (3) notified counsel that rather than lodging nine sets of objections and responses, Plaintiffs would seek a protective order prohibiting discovery on absent class members (including these subpoenas) without consent from Plaintiffs or leave of Court.

3. Without notice, Peters filed this motion to compel compliance with subpoenas to unnamed class members.

4. Peters did not propose revisions to cure Subpoena Requests 1-5 and 19.

Respectfully submitted,

/s/ Elizabeth A. Kramer

Elizabeth A. Kramer (*pro hac vice*)